

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	
)	Case No. 2:12-cv-01282-JLR
Plaintiff,)	
)	DECLARATION OF
v.)	KERALA T. COWART
)	
CITY OF SEATTLE,)	
)	
Defendant.)	
_____)	

I, KERALA T. COWART, being familiar with the facts set forth herein based on my personal knowledge, and being competent to testify, hereby declare under penalty of perjury that the following is true and correct:

1. I am the Assistant City Attorney representing Defendant City of Seattle as counsel of record in the above-captioned matter.
2. Attached as **Exhibit B** is a true and correct copy of a letter sent on June 12, 2019, by City of Seattle Director of Labor Relations to the Labor Relations Policy Committee and the Gender Equity, Safe Communities, New Americans & Education Committee of the Seattle City Council. The letter provides notification that the City will seek to commence collective bargaining with the Seattle Police Management Association in

1 December 2019.

- 2 3. Attached as **Exhibit B** is a true and correct copy of a letter sent on August 14, 2019, by
3 City of Seattle Director of Labor Relations to the Labor Relations Policy Committee
4 and the Gender Equity, Safe Communities, New Americans & Education Committee
5 of the Seattle City Council. The letter provides notification that the City will seek to
6 commence collective bargaining with the Seattle Police Officers Guild by no later than
7 April 2020 and as early as March 2020.

8
9 I declare under penalty of perjury that the foregoing is true and correct.

10 DATED this 15th day of August, 2019 at Seattle, King County, Washington.

11
12 s/ Kerala T. Cowart
13 KERALA T. COWART
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CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Brian T. Moran	Brian.Moran@usdoj.gov
Christina Fogg	Christina.Fogg@usdoj.gov
Matt Waldrop	james.waldrop@usdoj.gov
Gregory Colin Narver	gregory.narver@seattle.gov
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Bruce E.H. Johnson	brucejohnson@dwt.com
Eric M. Stahl	ericstahl@dwt.com

DATED this 15th day of August, 2019, at Seattle, King County, Washington.

s/ Kerala T. Cowart
Kerala T. Cowart, WSBA #53649
Assistant City Attorney
E-mail: kerala.cowart@seattle.gov

EXHIBIT B TO COWART DECLARATION

**Notice of Commencement of Collective
Bargaining with Seattle Police Management
Association**



City of Seattle

Seattle Department of Human Resources

Bobby Humes, Interim Director

June 12, 2019

Seattle City Council
Labor Relations Policy Committee
Gender Equity, Safe Communities, New Americans & Education Committee
600 Fourth Ave. 2nd Floor
Seattle, WA 98104

Dear Committee Members:

Pursuant to SMC 4.04.120(F), this letter serves to inform you regarding the anticipated commencement of collective bargaining with the Seattle Police Management Association which is set to begin in December, 2019.

Sincere Regards,

Laurie Brown
Director of Labor Relations
City of Seattle

cc: Jenny Durkan, Mayor
Pete Holmes, City Attorney
Carmen Best, Chief of Police
Bobby Humes, Interim SDHR Director
Lisa Judge, Inspector General
Andrew Myerberg, Office of Police Accountability Director
Jennifer Greenlee, Civil Service Commissions Executive Director
Bessie Marie Scott, Community Police Commission Interim Executive Director
Kirstan Arestad, City Council Central Staff Director
Peter Q. Nguyen, Labor Negotiator
Scott Bachler, SPMA President

Seattle Department of Human Resources

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EXHIBIT C TO COWART DECLARATION

**Notice of Commencement of Collective
Bargaining with Seattle Police Officers
Guild**



City of Seattle

Seattle Department of Human Resources

Bobby Humes, Director

August 14, 2019

Seattle City Council
Labor Relations Policy Committee and GENSCA Committee
600 Fourth Avenue, 2nd Floor
Seattle, Washington 98104

Dear Committee Members:

With the current Collective Bargaining Agreement with the Seattle Police Officers Guild (SPOG) expiring on December 31, 2020, the City of Seattle will seek to commence bargaining no later than April 2020 in accordance with city and state laws.

Pursuant to SMC 4.04.120(F), this letter serves to inform you regarding the anticipated commencement of collective bargaining with SPOG, which may begin as early as March 2020.

As contemplated in SMC 4.04.120(F), a joint meeting of the Council's Labor Policy Committee and Gender Equity, Safe Communities, New Americans & Education Committee should be held at least 90 days before the beginning of bargaining. The City is bound by law to "consider in good faith whether and how to carry forward the interests expressed at the public hearing. Those suggested changes that are legally required to be bargained with the SPOG, SPMA or their successor labor organizations will be considered by the City, in good faith, for inclusion in negotiations."

I look forward to working with LRPC and the Executive to bargain this upcoming Collective Bargaining Agreement.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jana Sangy", with a long, sweeping flourish extending to the right.

Jana Sangy
Director of Labor Relations

cc: Jenny Durkan, Mayor
Pete Holmes, City Attorney
Carmen Best, Chief of Police
Bobby Humes, SDHR Director
Lisa Judge, Inspector General
Andrew Myerberg, OPA Director
Jennifer Greenlee, Executive Director, Civil Service Commission
Bessie Marie Scott, Interim Executive Director, Community Police Commission
Kirstan Arestad, City Council Central Staff Director
Debra Hillary, SDHR Labor Negotiator
Kevin Stuckey, SPOG President

Seattle Department of Human Resources

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